

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OAKLEY, INC.,

Plaintiff,

v.

**CJDROPSHIPPING.COM and THE
OPERATOR OF
CJDROPSHIPPING.COM,**

Defendants.

Case No. 22-cv-01140

Judge Jorge L. Alonso

DECLARATION OF LIZHI ZHOU

I, Lizhi Zhou, hereby declare and state as follows:

1. I am over the age of eighteen and make this declaration from first-hand personal knowledge, unless otherwise indicated below.
2. I am the CEO of Yiwu Cu Jia Trade Co., Ltd. ("Cu Jia").
3. Cu Jia is the current operator of Defendant CJDropshipping.com.
4. Cu Jia is a company organized under the laws of the nation of China. Its office/headquarter is in China.
5. While Cu Jia is headquartered in China, CJDropshipping.com is an online drop-shipping platform that fulfill drop-shipper's sourcing requirements from various countries worldwide, including the United States and Europe. As a drop-shipping service provider, CJDropshipping.com helps drop-shippers to send items directly to their buyers. *Id.* In total, CJDropshipping.com lists more than 937,644 products on the website
6. Cu Jia has no officers or employees within the Illinois.

7. Cu Jia does not have bank accounts in the Illinois.
8. Cu Jia does not have telephone number, telephone listings, or mailing addresses in Illinois.
9. Cu Jia does not manufacture anything in Illinois.
10. Cu Jia does not pay Illinois taxes.
11. Cu Jia does not own any property and has no interest in any property with the Illinois.
12. Cu Jia does not have registered agent for service of process in Illinois.
13. The accused infringing product was supplied from a third-party supplier. The supplier's name is Heyang Industrial Co. Ltd.
14. Attached as Exhibit A-1 is a true and correct copy of the sales record of the accused product, which was collected under my direction from business records that Cu Jia regularly keeps. As the Exhibit shows, CJDropshipping.com only sourced 14 units of the accused products which 13 units were shipped to Slovakia. The only 1 unit that was shipped to the United States was caused by Plaintiff's "test buy." The accused products have been removed from CJDropshipping.com upon actual notice of this lawsuit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was executed on August 12, 2022, in Hangzhou, China.


Lizhi Zhou

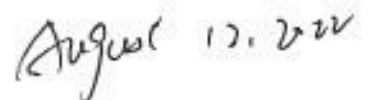


Exhibit A-1

Order No.	Payment Time	SKU	Units	Price	Seller Name	Customer Name	Country
1430429561371480070	2021-08-26 10:44:48	CJNSFJST00304-Black-L	1	6.1	Kamil Gabriš	Jozef Deák	Slovakia
1448883718629597186	2021-10-19 11:44:21	CJNSFJST00304-Khaki-L	1	6.1	Kamil Gabriš	Zuzana Hermannová	Slovakia
1450706005695555825	2021-10-20 08:58:59	CJNSFJST00304-Khaki-XL	1	6.1	Kamil Gabriš	Daniel Molnár	Slovakia
1458682870926348291	2021-11-11 07:38:06	CJNSFJST00304-Black-L	1	6.1	Kamil Gabriš	Michal Pytel	Slovakia
1462699245843943427	2021-11-22 10:42:31	CJNSFJST00304-Black-L	1	6.1	Kamil Gabriš	Marián Húdek	Slovakia
1468098959434680320	2021-12-07 10:26:22	CJNSFJST00304-Black-L	1	6.29	Kamil Gabriš	Vladimír Pavučok	Slovakia
1470296889474838532	2021-12-13 10:52:09	CJNSFJST00304-Black-L	1	6.29	DropshippingOld Account	Filip Holubek	Slovakia
1470296889474838547	2021-12-13 10:52:09	CJNSFJST00304-Black-L	1	6.29	DropshippingOld Account	Anikó Czégény	Slovakia
1471006628584316938	2021-12-15 17:25:13	CJNSFJST00304-Black-L	1	6.29	DropshippingOld Account	Jozef Hrenák	Slovakia
1482952787108294656	2022-01-17 07:55:35	CJNSFJST00304-Black-L	1	6.29	DropshippingOld Account	Karol Jelen	Slovakia
1485438919267987464	2022-01-24 12:37:30	CJNSFJST00304-Khaki-L	1	6.1	DropshippingOld Account	Ján Slašťan	Slovakia
1430004192826867713	2021-08-26 13:04:23	CJNSFJST00304-Khaki-XL	1	6.1	Kamil Gabriš	Pavel Veselovský	Slovakia
1430004192826867715	2021-08-26 13:04:23	CJNSFJST00304-Khaki-XL	1	6.1	Kamil Gabriš	Pavel Veselovský	Slovakia
ZF22012466543165730	2022-01-24 16:46:24	CJNSFJST00304-Khaki-L	1	6.1	Kay McGovern	Kay McGovern	U.S.A.